

# WIPES

## HAZARDS & RULES

### Base Materials - Hazards & Impacts

Wipes (industrial shop towels, rags, paper towels, gloves, cotton swabs, etc.) are not hazardous unless they come into contact with hazardous materials or hazardous wastes.

### Additives and Contaminants - Hazards & Impacts

As wipes are used to clean up spills and remove oils, they become contaminated with automotive fluids and cleaning solvents. Many products used in the vehicle maintenance industry, such as engine degreasers, fuel injection cleaners, and brake cleaners and fluids contain hazardous solvents that are flammable (ignitable) and/or toxic if inhaled or adsorbed through the skin. Product material safety data sheets, (MSDS) should be reviewed to determine if products used at your facility contain hazardous materials.

### Regulatory Overview

IDEM regulates **disposable** wipes that are considered to be a hazardous waste or a special waste. You must make a hazardous waste determination on your used disposable wipes. If your contaminated wipes are not a hazardous waste, you must determine if they are a special waste and, if so, are generated in quantities that are subject to special waste management requirements. As mentioned in Section 2.7, petroleum-contaminated spill waste (e.g., wipes and sorbents used to clean up a spill of petroleum-contaminated waste) must be managed as a special waste if you generate more than 220 pounds per month or dispose of them in quantities greater than 2,204 pounds per shipment. If you determine that you must manage your disposable wipes as a special waste, contact IDEM's Office of Solid and Hazardous Waste, Special Waste Section or CTAP for assistance.

If the products used at your facility contain any of the following constituents, then your **disposable** wipes, when contaminated, could exhibit hazardous characteristics and may be regulated as a hazardous waste by IDEM:

- heavy metals such as arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver;
- chlorinated solvents such as monochlorobenzene; 1,4- dichlorobenzene; 1,2- dichloroethane; 1,1-dichloroethylene; pentachlorophenol; methylene chloride; trichloroethane; trichloroethylene; tetrachloroethylene and any chlorinated fluorocarbons; or
- toxic solvents such as benzene, toluene, xylene, pyridine, 2-ethoxyethanol, methyl ethyl ketone, and 2-nitropropane.

If the products used at your shop are a listed waste when discarded (i.e., contain a chemical on the list of listed wastes), your contaminated wipes will automatically be a hazardous waste

when disposed. The list of listed wastes is available via the Fax-On-Demand system or by visiting IDEM's web site.

Contaminated wipes that are **laundered** are not regulated as a hazardous waste unless they are used to clean up spills of hazardous waste or unless a hazardous waste is added to the container of wipes. They are, however, still regulated by IDEM's Office of Air Management, OSHA and the Department of Fire & Building Services.

## **MANAGEMENT RESPONSIBILITIES**

Managing your used wipes may be done in a number of different ways, depending upon the type of wipes that you use and the contaminant(s) that have been absorbed. Listed below are the management options you must follow. Also listed are suggested practices that you should follow in order to ease your regulatory requirements and improve the environmental health of your shop.

### **You Must:**

For laundered wipes, you must:

- !** if you are sending reusable wipes that exhibit hazardous waste characteristics to a laundry, you must:
  - store contaminated wipes in closed containers to prevent the evaporation of any contaminants into the air. If the wipes are contaminated with flammable or combustible liquids, you must store the wipes in a container meeting the requirements of the Indiana Department of Fire & Building Services. Contact the Plan Review Division for more information. [IDEM and Department of Fire & Building Services]
  - not use wipes to clean up spills of hazardous wastes. Wipes that are sent to a laundry are not regulated as a hazardous waste unless they were used to clean up spills of hazardous wastes. If your wipes were used for this purpose, they must be managed as a hazardous waste.
  - ensure that your storage containers are not accumulating free liquids in the bottom of the container. If the container has free liquids, transfer the free liquid into another container and manage by its hazardous classification. Laundries will not accept wipes containing free liquids.

### **You Should:**

Laundered Wipes:

- !** provide the commercial laundry with material safety data sheets for all products used at your facility.
- !** recover as much free liquid from contaminated wipes as possible by wringing the wipes. Industrial laundries may not accept wipes containing any free liquids. Contain liquids wrung from wipes and manage these liquids with other hazardous or non hazardous liquid wastes.
- !** segregate contaminated wipes from your uniforms and other laundry items.

- ! follow management practices for handling soiled reusable textiles outlined by the Uniform & Textile Service Association. This guidance document can be obtained from the Fax-On-Demand System.

**You Must:**

For disposable wipes, you must:

- ! make a hazardous waste determination on your used wipes. If the wipes are a hazardous waste, you must manage them accordingly (see Chapter 3.)
- ! not air dry contaminated wipes to remove ignitable or toxic characteristics prior to disposal.
- ! store contaminated wipes in closed containers to prevent the evaporation of any contaminants into the air. If your disposable wipes are contaminated with flammable or combustible liquids, you must store the wipes in a container meeting the requirements of the Indiana Department of Fire & Building Services. Contact the Plan Review Division for more information. [IDEM and Department of Fire & Building Services]

**You Should:**

For disposable wipes, you should:

- ! segregate hazardous wipes from other waste materials to avoid generating an increased volume of hazardous waste.
- ! substitute less toxic commercial products for products that contain hazardous and/or toxic constituents to minimize the generation of hazardous wipes.
- ! accumulate and store hazardous wipes in a drum that meets DOT requirements, with the DOT Class 9 hazard sticker placed on the side of the drum. When your drum is filled, label it to include the proper DOT shipping name for hazardous waste wipes  
"RQ, Hazardous Waste, Solid, n.o.s., Class 9, NA3077, PG III."

(Note that you must do this prior to shipping your hazardous wipes, but are not required to meet DOT requirements while the waste is accumulating or being stored.)

